

Hearing date: April 28, 2015 at 2:00 p.m.  
Objection Deadline: April 22, 2015 at 12 noon

Aaron R. Cahn  
Justin A. Greenblum  
Robert J.A. Zito  
CARTER, LEDYARD & MILBURN LLP  
2 Wall Street  
New York, New York 10005  
Telephone: (212) 732-3200  
Facsimile: (212) 732-3232

ATTORNEYS FOR CORPORATE RESOURCE SERVICES, INC.

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

	X	
	:	
<b>In Re</b>	:	<b>Chapter 11</b>
	:	
<b>TS EMPLOYMENT, INC.</b>	:	<b>Case No. 15-10243 (MG)</b>
	:	
<b>Debtor.</b>	:	
	:	
	:	
	X	

**STATEMENT BY CORPORATE RESOURCE SERVICES, INC. AND  
CARTER LEDYARD & MILBURN LLP IN OPPOSITION TO *EX PARTE*  
APPLICATION BY CHAPTER 11 TRUSTEE FOR AN ORDER TO ENSURE  
PRESERVATION OF DOCUMENTS AND TO ALLOW THE TRUSTEE  
IMMEDIATE ACCESS TO COMPUTERS AND SERVERS (Doc. No. 60)**

Corporate Resource Services, Inc. ("CRS"), by its undersigned counsel, herewith joins in the objection (the "Objection") of Tri-State Employment Services, Inc. ("Tri-State"), and Prokauer Rose LLP ("Proskauer") to the *ex parte* application by the Chapter 11 Trustee to Ensure Preservation of Documents and other relief (Doc. No. 98). Carter Ledyard & Milburn LLP ("Carter"), on its own behalf, also joins in the Objection with respect to relief sought directly against it.

1. As succinctly set forth in the Objection, the Trustee and his counsel have brought on an application which, as to the corporate parties, is almost entirely moot, and which as to the law firms, Proskauer and Carter, they have already conceded to be unnecessary and inappropriate.

2. As noted in the Objection, no facts are stated that would support any relief against either law firm, and Trustee's counsel has conceded that no such facts exist. Discovery against the two corporate parties is nearly complete, and the Trustee does not suggest any rational basis for court intervention.

3. The Trustee presents only the rankest of speculation as to the need for any of the relief sought in this motion. Indeed, as the Objection sets forth, the entire basis for the Trustee's allegations of fraud and misconduct may be entirely misguided and the result of misreading of relatively straightforward financial records. But even without that, the Trustee has obtained or is in the process of obtaining without resistance, all the information he requires or could conceivably require. The only effect of this application is to waste estate resources and concomitantly to drive up the costs for the parties who need to resist frivolous applications such as this.

WHEREFORE, CRS and Carter request that this application be denied in all respects.

Dated: New York, New York  
April 22, 2015

CARTER, LEDYARD & MILBURN LLP

By: /s/ Aaron R. Cahn  
Aaron R. Cahn  
Justin A. Greenblum

Robert J.A. Zito  
Carter, Ledyard & Milburn LLP  
2 Wall Street  
New York, New York 10005  
Telephone: (212) 732-3200  
Facsimile: (212) 732-3232

Attorneys for Corporate Resource  
Services, Inc.